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May 6, 2024 (Via Electronic Filing Only)

Hon. Renee Bumb, USDJ
Mitchell H. Cohen Building
& U.S. Courthouse 4th & Cooper Streets
Camden, NJ 08101

RE: Abdullah versus Rowan University case number 1:21 –cv– 19256- Concerning defendants’ motion to dismiss with prejudice currently pending

Dear Judge Bumb:

Allow me to inform the court that the supplemental brief is due today, and we are attempting to comply with your order dated April 24, 2024.

Briefly, the plaintiff, my client, was hospitalized from March 13 to April 14. Since her discharge, she has been required to attend both physical and occupational therapy since leaving the hospital because she is still experiencing severe pain. A letter from her doctor has informed the defendant, Rowan University, about her health condition.

Due to her ongoing therapy, she is also in the process of seeking assisted living accommodations, as she cannot dress herself without considerable help and assistance.

I wanted to let the court know that we are trying to complete the brief. However, without the ability to communicate effectively with my client (as I am relatively new counsel and was not involved in drafting the second complaint), it has been challenging to clarify certain facts without speaking with her.

I kindly ask for the court's understanding that we are a few days behind schedule. We aim to submit the brief by May 9, and we are working diligently to complete it sooner.

Thank you for your consideration given the circumstances.

Respectfully submitted,

Gary D. Grant

Attorney for the Plaintiff